

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

SEP 22 2016

CLYDE, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

EXXON MOBIL CORPORATION,)

Plaintiff,)

v.)

No. 4:16-cv-00469-K

MAURA TRACY HEALEY,)
Attorney General of Massachusetts,)
in her official capacity,)

Defendant.)

**MOTION FOR LEAVE TO FILE AN *AMICUS* BRIEF IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION IN TEXAS**

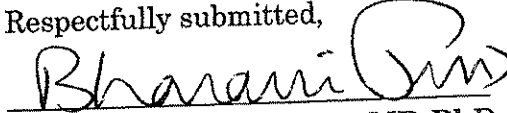
Bharani Padmanabhan MD PhD
30 Gardner Road #6A
Brookline MA 02445
Tel. + Fax 617 5666047
scleroplex@gmail.com

Pursuant to Local Rule 7.2 (b), Dr. Bharani respectfully requests the Court's leave to file a brief as *amicus curiae* in support of the Plaintiff, Exxon Mobil Corporation. As set forth in the certificate, neither Plaintiff nor Defendant responded to Movant's attempts to confer and seek consent.

As this matter is of immense importance in terms of public policy and the rule of law, and Dr. Bharani has directly relevant factual information that would be of help to this Court in deciding on Plaintiff's petition for an injunction, Dr. Bharani independently submits this motion for leave and attaches a memorandum in support of the motion as well as the proposed 10-page amicus brief for the Court's kind consideration, in compliance with Local Rule 7.1 (h).

21 September 2016

Respectfully submitted,



Bharani Padmanabhan MD PhD

amicus curiae

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Brookline MA 02445

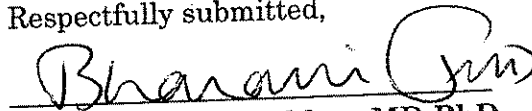
617 5666047 scleroplex@gmail.com

Certificate of Conference

Dr. Bharani emailed Plaintiff's counsel on September 15, 2016 and again on September 20, 2016, but as of this writing has not received any response. Dr. Bharani emailed Defendant's counsel on September 20, 2016, but as of this writing has not received any response.

21 September 2016

Respectfully submitted,



Bharani Padmanabhan MD PhD

amicus curiae

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Brookline MA 02445

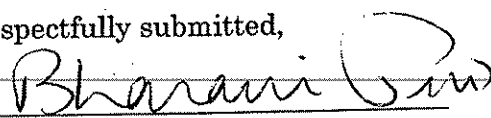
617 5666047 scleroplex@gmail.com

Certificate of Service

Dr. Bharani certifies that he has served a copy of this motion, memorandum and proposed amicus brief upon counsel for both Plaintiff and Defendant via email and/or First Class mail.

Respectfully submitted,

21 September 2016


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